

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
EL DORADO DIVISION

US DISTRICT COURT
WESTERN DIST ARKANSAS
FILED
12/04/2019

UNITED STATES OF AMERICA,)
Plaintiff)
v.) No. 19-1058 SOH
MEGAN T. HARRIS,)
Defendant)

COMPLAINT

The United States of America, through counsel, hereby files a complaint against Megan T. Harris under the Federal Debt Collection Procedures Act, 28 U.S.C. § 3001.

1. This Court has jurisdiction over this case pursuant to 28 U.S.C. § 1345.
2. The defendant resides in Ashley County which is within the Western District of Arkansas, El Dorado Division.
3. The defendant entered into a contract with the United States Department of Health and Human Services (“HHS”) pursuant to the National Health Service Corps Loan Repayment Program (“NHSC/LRP”), under which the defendant agreed to enter into a two-year, full-time service obligation as a provider of clinical health services in a health professional shortage area. In consideration therefore, HHS would disburse funds to repay defendant’s outstanding educational loans. A copy of said contract is attached hereto as Exhibit 1.
4. Pursuant to the contract, HHS disbursed the promised funds to the defendant.
5. The defendant, however, completed one hundred seventy seven (177) days; 5 full service months of her two year NHSC/LRP service obligation, thus breaching her NHSC/LRP contract.

6. Because the defendant did not complete her NHSC/LRP service obligation, all funds paid to her for the period of service not served, plus penalties and interest pursuant to 42 U.S.C. § 254o(c)(1), became a debt to the United States.

7. The defendant is in debt to the United States in the principal amount of \$180,393.30 plus interest on this principal computed at the applicable note rate in the amount of 10% per annum with a total due of \$251,011.59 as of September 17, 2019, and interest thereafter on this principal at the applicable note rate from this date until the date of judgment. A copy of the Certificate of Indebtedness establishing the basis for the defendant's liability regarding this debt is attached hereto as Exhibit 2.

8. The United States has made a demand to the defendant for the amount owed, however, the amount due remains unpaid.

9. The amounts set forth in paragraph seven are a debt to the United States as defined in the FDCPA. 28 U.S.C. § 3002(3).

10. The United States is entitled to a judgment in connection with defendant's debt to the United States. 28 U.S.C. § 3001(a)(2).

WHEREFORE, plaintiff, United States of America, requests this Court to:

a. Enter judgment against the defendant, in the sum of \$251,011.59, plus interest until paid, costs of this suit, and \$350.00 filing fees pursuant to 28 U.S.C. § 1914(a); and \$20.00 docket fees pursuant to 28 U.S.C. § 1923.

b. Grant such other and further relief as is just and proper.

DUANE DAK KEES
UNITED STATES ATTORNEY

By: *Candace L. Taylor*

Candace L. Taylor
Assistant U. S. Attorney
Ark. Bar Number 98083
414 Parker Avenue
Ft. Smith, AR 72901
Phone: (479) 783-5125
Fax: (479) 441-0569
Email: candace.taylor@usdoj.gov